Remarks

In response to the Office Action mailed on November 5, 2010, Applicants respectfully request reconsideration in view of the following remarks. In the present application, claims 1, 12, 23 and 52 have been amended for clarification. Support for the amended claims may be found at least in paragraphs 61-64 in the Specification. No new matter has been added.

In the Office Action, claims 1 and 4-8 are rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by Dantzig. Claims 3, 9-46 and 52 are rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Dantzig in view of Ladd. Claims 47-51 are rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Dantizig in view of Ladd and WCW Working Draft ("Grammar Representation Requirements for Voice Markup Languages" – hereinafter "WCW Working Draft").

Claim Rejections - 35 U.S.C. §102(e)

In the Office Action, claims 1 and 4-8 are rejected as being alleged anticipated by Dantzig. The rejection of these claims is respectfully traversed.

Amended independent claim 1 is patentably distinguishable over the cited art for at least the reason that it recites, for example, "the set of controls accessing and using a first library for the visual rendering and a second library for the at least one of recognition and audibly prompting, the first library including methods for generating the client side markup and a plurality of event handlers, the first library further comprising a plurality of website authoring tools, the second library including markup information for performing the at least one of recognition and audibly prompting."

It is respectfully submitted that Dantzig fails to teach the aforementioned recitation in amended independent claim 1. For example, Dantzig discusses rendering modality-independent scripts (e.g., intent-based markup scripts) in a multi-modal environment whereby a user can interact with the application using a plurality of modalities (e.g., speech and GUI). (See col. 2, lines 45-51.)

Dantzig however, fails to teach the use of libraries for visual rendering, recognition and/or audibly prompting because Dantzig is merely directed to the use of modalities (e.g., speech and GUI). Dantzig further fails to teach that a first library includes methods for generating the client side markup, a plurality of event handlers and a plurality of website authoring tools. Dantzig further fails to teach that a second library includes markup information for performing the at least one of recognition and audibly prompting. In contrast, Dantzig appears to be silent with respect to the aforementioned features.

Dantzig would not have led to the claimed invention because the reference fails to at least teach "the set of controls accessing and using a first library for the visual rendering and a second library for the at least one of recognition and audibly prompting, the first library including methods for generating the client side markup and a plurality of event handlers, the first library further comprising a plurality of website authoring tools, the second library including markup information for performing the at least one of recognition and audibly prompting." Accordingly, amended independent claim 1 patentably distinguishes the claimed invention over the cited reference, and Applicants respectfully request withdrawal of the current rejection of this claim. Dependent claims 4-8 also patentably distinguish the claimed invention over the cited reference at least for the reasons described above regarding amended independent claim 1 by virtue of their

dependencies upon the aforementioned claim. Accordingly, Applicants respectfully request withdrawal of the current rejection of these dependent claims.

Claim Rejections - 35 U.S.C. §103(a)

In the Office Action, claims 3, 9-46 and 52 are rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Dantzig in view of Ladd. The rejection of these claims is respectfully traversed.

Claims 3, 9-46 and 52 included similar recitations as amended claim 1 (discussed above) and thus are allowable over Dantzig for at least the same reasons. Ladd fails to overcome the deficiencies of Dantzig at least because Ladd fails to teach, disclose or suggest "...accessing and using a first library for the visual rendering(s) and a second library for the at least one of recognition and audibly prompting, the first library including methods for generating the client side markup and a plurality of event handlers, the first library further comprising a plurality of website authoring tools, the second library including markup information for performing the at least one of recognition and audibly prompting."

For example, Ladd discusses a markup language for providing interactive services. Step elements contained within a markup language document include "prompt" elements which include announcements to be read to a user, and input elements which include inputs corresponding to a user input. Markup language documents may be created in which "prompt" elements are selected and voice communications defined in the "prompt" elements are read to a user. The created markup language documents may also include selecting input elements and defining input variables to store data inputted by the user. (See Abstract.)

Ladd however, fails to teach, disclose or suggest the use of libraries for visual rendering, recognition and/or audibly prompting because Ladd is directed to the creation of markup language documents which include prompt and input elements for defining voice communications and storing user input variables. Ladd further fails to teach, disclose or suggest that a first library includes methods for generating the client side markup, a plurality of event handlers and a plurality of website authoring tools. Ladd further fails to teach, disclose or suggest that a second library includes markup information for performing the at least one of recognition and audibly prompting. In contrast, Ladd is silent with respect to a library including event handlers and website authoring tools. Moreover, Ladd merely discusses the use of created markup language documents which include prompt elements (and not libraries) for defining voice communications.

The combination of Dantzig and Ladd would not have led to the claimed invention because these references fail to at least teach, disclose, or suggest "...accessing and using a first library for the visual rendering(s) and a second library for the at least one of recognition and audibly prompting, the first library including methods for generating the client side markup and a plurality of event handlers, the first library further comprising a plurality of website authoring tools, the second library including markup information for performing the at least one of recognition and audibly prompting." Accordingly, claims 3, 9-46 and 52 patentably distinguish the claimed invention over the cited references, and Applicants respectfully request withdrawal of the current rejection of these claims.

Claim Rejections - 35 U.S.C. §103(a)

In the Office Action, claims 47-51 are rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Dantzig in view of Ladd and WCW Working Draft. The rejection of these claims is respectfully traversed.

Claims 47-51 depend from amended independent claim 23 and thus include at least the same recitations. Thus, claims 47-51 are allowable over the combination of Dantzig and Ladd at least for the reason that they recite "the first set of controls accessing and using a first library for the visual renderings, the second set of controls accessing and using a second library for the at least one of recognition and audibly prompting, the first library including methods for generating the client side markup and a plurality of event handlers, the first library further comprising a plurality of website authoring tools, the second library including markup information for performing the at least one of recognition and audibly prompting."

WCW Working Draft fails to overcome the deficiencies Dantzig-Ladd. For example, WCW Working Draft discusses grammars for voice markup languages with attributes where confidence scoring tightens or relaxes the normal rejection constraints to provide content base control of performance. (See Sections 4.3 and 5.1.) WCW Working Draft, however, fails to fails to teach, disclose or suggest the use of libraries for visual rendering, recognition and/or audibly prompting because WCW Working Draft is directed to voice markup language grammars and not libraries including methods for generating the client side markup, a plurality of event handlers, a plurality of website authoring tools and markup information for performing the at least one of recognition and audibly prompting.

The combination of Dantzig, Ladd and WCW Working Draft would not have led to the claimed invention because these references fail to at least teach, disclose, or suggest "the first set of controls accessing and using a first library for the visual renderings, the second set of controls accessing and using a second library for the at least one of recognition and audibly prompting, the first library including methods for generating the client side markup and a plurality of event handlers, the first library further comprising a plurality of website authoring tools, the second library including markup information for performing the at least one of recognition and audibly prompting." Accordingly, claims 47-51 patentably distinguish the claimed invention over the cited references, and Applicants respectfully request withdrawal of the current rejection of these claims.

Conclusion

The preceding arguments are based only on the arguments in the Office Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Office Action. Thus, the claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability. Furthermore, the Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

In view of the foregoing remarks, Applicants respectfully submit that the claimed invention embodiments, as amended, are neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants therefore request the entry of this

Amendment, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 13-2725.

Respectfully submitted,

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